

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STEVEN WELLS,)	
)	
Plaintiff,)	No. 08 C 598
)	
vs.)	Judge Shadur
)	
CITY OF CHICAGO, ILLINOIS,)	
CHICAGO POLICE OFFICER)	Magistrate Judge Mason
LIONEL PIPER, Star No. 14650,)	
CHICAGO POLICE OFFICER WEST,)	
Star No. 8589, and CHICAGO POLICE)	
OFFICER BROWN, Star No. 19615,)	
)	
Defendants.)	

**DEFENDANT CITY OF CHICAGO’S MOTION TO STAY *MONELL*
DISCOVERY AND FOR ENTRY OF CERTIFICATION OF INDEMNIFICATION**

Defendant City of Chicago, by its attorney, Mara S. Georges, Corporation Counsel, moves this court to stay *Monell* discovery in this case and to enter its Certification of Indemnification, and in support states:

1. Plaintiff Steven Wells has brought this Section 1983 action against defendants City of Chicago and three individual Chicago police officers. As to the City, plaintiff alleges that it has certain policies and practices that caused his constitutional injuries.¹

2. In the interest of judicial and litigation economy, the City moves this court to stay *Monell*-related discovery and proof during the pendency of this case.

3. Additionally, the City moves this court to enter the attached “Certification of Indemnification,” according to which the City agrees, among other things, unconditionally and

¹ See, e.g., Pl.’s Compl., ¶¶ 16(a-h), 20(a-h).

irrevocably to indemnify the individual defendant Chicago police officers for any judgment of compensatory damages that may be entered against them in this case.

4. The City understands that if this court grants this motion and enters its proposed “Certification of Indemnification,” it will remain in this lawsuit only for purposes of assuring its compliance with the terms of its Certification, as all other claims against the City will have been mooted.

Respectfully submitted,
MARA S. GEORGES
Corporation Counsel of the City of Chicago

BY: /s/ Meghan K. Kennedy
Assistant Corporation Counsel

30 North LaSalle Street - Suite 1020
Chicago, Illinois 60602
312.744.9653
Atty. No. 6283230